

1 Magistrate Judge Theiler  
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8 JUL 06 2009  
9 BY CLERK U.S. DISTRICT COURT  
10 AT SEATTLE  
11 WESTERN DISTRICT OF WASHINGTON  
12 DEPUTY



10 09-MJ-00336-M  
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15 UNITED STATES DISTRICT COURT  
16 WESTERN DISTRICT OF WASHINGTON  
17 AT SEATTLE/TACOMA

18 UNITED STATES OF AMERICA, }  
19 Plaintiff, }  
20 v. }  
21 JAGMOHAN S. DHILLON, }  
22 Defendant. }

23 NO. MJ09-336  
24 MOTION FOR DETENTION  
25 ORDER

26 The United States moves for pretrial detention of the Defendant, pursuant to  
27 18 U.S.C. § 3142(e) and (f)

28 1. Eligibility of Case. This case is eligible for a detention order because this  
case involves (check all that apply):

29      Crime of violence (18 U.S.C. § 3156)  
30      Crime of Terrorism (18 U.S.C. § 2332b(g)(5)(B)) with a maximum sentence  
31         of ten years or more  
32      Crime with a maximum sentence of life imprisonment or death  
33      Drug offense with a maximum sentence of ten years or more  
34      Felony offense and defendant has two prior convictions in the four  
35         categories above, or two State convictions that would otherwise fall within  
36         these four categories if federal jurisdiction had existed.  
37      Felony offense involving a minor victim other than a crime of violence

1       — Felony offense, other than a crime of violence, involving possession or use  
2        of a firearm, destructive device (as those terms are defined in 18 U.S.C.  
§ 921), or any other dangerous weapon

3       — Felony offense other than a crime of violence that involves a failure to  
4        register as a Sex Offender (18 U.S.C. § 2250)

5        Serious risk the defendant will flee

6       — Serious risk of obstruction of justice, including intimidation of a  
prospective witness or juror

7       2. Reason for Detention. The Court should detain defendant because there are  
8       no conditions of release which will reasonably assure (check one or both):

9        Defendant's appearance as required

10      — Safety of any other person and the community

11       3. Rebuttable Presumption. The United States will invoke the rebuttable  
12       presumption against defendant under § 3142(e). The presumption applies because:

13      — Probable cause to believe defendant committed offense within five years of  
14       release following conviction for a “qualifying offense” committed while on  
pretrial release.

15       Probable cause to believe defendant committed drug offense with a  
maximum sentence of ten years or more

16      — Probable cause to believe defendant committed a violation of one of the  
17       following offenses: 18 U.S.C. §§ 924(c), 956 (conspiracy to murder or  
kidnap), 2332b (act of terrorism), 2332b(g)(5)(B) (crime of terrorism)

18      — Probable cause to believe defendant committed an offense involving a  
19       victim under the age of 18 under 18 U.S.C. §§ 1591, 2241, 2242,  
2244(a)(1), 2245, 2251, 2251A, 2252(a)(1) through 2252(a)(3),  
2252A(a)(1) through 2252A(a)(4), 2260, 2421, 2422, 2423 or 2425.

21       4. Time for Detention Hearing. The United States requests the Court conduct  
22       the detention hearing:

23                  At the initial appearance

24       After continuance of 3 days (not more than 3)

## 5. Other matters.

DATED this 6<sup>th</sup> day of July, 2009.

Respectfully submitted,  
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